

462

CAUSE NO. **F21-1205-462** TRN: 929890598X / A002, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, D044, D045, D046, D047, D048, D049, D050, D051, D052, D053, D054, D055, D056, D057, D058, D059, D060, D061, D062, D063, D064, D065, D066, D067, D068, D069, D070, D071, D072, D073, D074, D075, D076, D077, D078, D079, D080, D081, D082, D083, D084, D085, D086, D087, D088, D089, D090, D091, D092, D093, D094, D095, D096, D097, D098, D099, D100, D101, D102, D103, D104, D105, D106, D107

BOND: **3 207,500** ☐ BOND CONDITIONS ☐ FV ☐ DWI ☐ CAC PID NO. 340497

DEFENDANT: ZUL MOHAMED SID: TX 05730763 W/M 04/11/1981

CHARGE: FRAUDULENT USE OF APPLICATION FOR BALLOT BY MAIL (84 COUNTS)

ART: NONE SEC: 84.0041 CODE: ELECTION

CO-DEFENDANT: NONE WARRANT NO: 20-596318-B

WITNESS: E.HAMBLIN CONTROL NO: 20-12497

**FILED**  
AT 1:12 O'CLOCK P.M.  
MAY 11 2021  
DISTRICT CLERK  
Denton County, Texas  
BY *[Signature]*

**TRUE BILL OF INDICTMENT**

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

COUNT I

THE GRAND JURORS, in and for the County of Denton, State of Texas, duly organized, impaneled, and sworn as such, at the January Term, A.D., 2021, of the District Court of the 16th Judicial District in and for said county and state, upon their oaths, present in and to said Court that ZUL MOHAMED, who is hereinafter styled defendant, on or about the 22nd day of September, 2020, and anterior to the presentment of this Indictment, in the county and state aforesaid, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Shirley Abrams;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT II

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Dale Adams;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT III

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Linda Baker;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 2

COUNT IV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Cheryl Ball;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT V

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of James Bates;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT VI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Jennifer Beaty;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT VII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of James Bieda;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT VIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Terry Bird;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 3

COUNT IX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Pamela Bissett;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT X

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Mark Boyd;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Peter Bugnacki;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Darla Burfield;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Donald Bush;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 4

COUNT XIV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Lynn Butler;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of James Chaney;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XVI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Michael Christian;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XVII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Stephen Collins;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XVIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Felix Cortez Jr.;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 5

COUNT XIX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Deborah Curley;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Sandra Darling;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Deborah Dennis;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Sandra Dickinson;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Bruce Donze;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 6

COUNT XXIV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Richard Doty;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Jill Doyle;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXVI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Richard Duggan;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXVII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of John Ehlert Jr.;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXVIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Susan Espy;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 7

COUNT XXIX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Loretta Evans;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of John Frost;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXXI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Alberta Frost;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXXII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Dennis Gartin;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXXIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Henry Glospe;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 8

COUNT XXXIV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of John Gondolf;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXXV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Sharon Gonzales;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXXVI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Sandra Gordon;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXXVII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Carolyn Harris;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XXXVIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Michael Harrison;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 9

COUNT XXXIX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Cathy Headley;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XL

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Gregory Hicks;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XLI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Marsha Hill;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XLII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Gilberto Ibarra;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XLIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Mariamma Jacob;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 10

COUNT XLIV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Cecilia Janssen;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XLV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Patricia Jevec;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XLVI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Maher Karam;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XLVII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Hal Kirk;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT XLVIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Charlotte Kivioja;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 11

COUNT XLIX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Roy Lawson;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT L

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Richard Leffke;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Dina Mathews;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Michael McCown;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Robert Molchanov;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 12

COUNT LIV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Randall Moody;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Paul Pennington;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LVI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Gayle Poudevigne;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LVII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Bruce Powell;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LVIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Kevin Riley;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 13

COUNT LIX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Robert Riska;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Brenda Rudd;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Sherry Ruff;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of David Schmalz;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Edward Shaffer;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 14

COUNT LXIV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Peggy Shipman;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Nancy Sponhour;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXVI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of David Sponhour;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXVII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Jerry Stem;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXVIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22<sup>nd</sup> day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Beverly Stone;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 15

COUNT LXIX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Retha Strom;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Joan Swenson;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXXI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Rita Swindle;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXXII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Gerald Thompson Jr.;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXXIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Gary Thurman;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 16

COUNT LXXIV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Michael Tlanda;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXXV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Christopher Tobey;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXXVI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Gregory Varrelman;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXXVII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Terri Vest;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXXVIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Michael Walker;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 17

COUNT LXXIX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Terry Warner;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXXX

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Mark Wenger;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXXXI

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Cynthia Wisdom;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXXXII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of John Wisdom;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

COUNT LXXXIII

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Cheryl Wooliscroft;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

DEFENDANT: MOHAMED

PAGE 18

COUNT LXXXIV

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that ZUL MOHAMED, on or about the 22nd day of September, 2020, and anterior to the presentment of this indictment, in the County of Denton and State of Texas, did then and there intentionally or knowingly submit an application for ballot by mail without the knowledge and authorization of Wagdy Yaft;

And it is further presented that the defendant committed another offense under Section 84.0041 of the Texas Election Code in the same election;

against the peace and dignity of the State.

PAUL JOHNSON

CRIMINAL DISTRICT ATTORNEY OF  
DENTON COUNTY, TEXAS



Foreman of the Grand Jury